

**INITIAL STATEMENT OF REASONS**  
**FOR**  
**PROPOSED BUILDING STANDARDS**  
**OF THE**  
**OFFICE OF STATEWIDE HEALTH PLANNING AND DEVELOPMENT**  
  
**REGARDING THE CALIFORNIA ELECTRICAL CODE**  
**CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 3**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

**STATEMENT OF SPECIFIC PURPOSE AND RATIONALE:**

**Article 089-7**

The Office of Statewide Health Planning and Development promulgates and enforces regulations for hospitals and skilled nursing facilities (SNFs) in California. Historically, the California Building Code has included different requirements for hospital-based skilled nursing units than it has for freestanding SNFs on a hospital license and for separately licensed SNFs.

Section 72103 of Title 22, CCR, defines "skilled nursing facility" as "a health facility or a distinct part of a hospital which provides continuous skilled nursing care and supportive care to patients whose primary need is for availability of skilled nursing care on an extended basis." This definition makes no distinction between skilled nursing services that are provided as a distinct part unit in an acute care hospital, as a distinct part in a freestanding building on the hospital license, or a freestanding separately licensed SNF. Therefore, the regulations that apply to skilled nursing services should be the same, regardless of the type of facility in which the services are provided.

The purpose for this change is to make the regulations for skilled nursing facilities the same, whether the facility is a freestanding separately licensed SNF, a freestanding SNF building on a hospital license, or a distinct part SNF unit in a hospital building.

**ARTICLE 517-33 (a)**

The California Electrical Code (CEC) does not specifically require the pressure monitoring alarm systems for negative pressure isolation rooms and positive pressure isolation rooms to be on the essential electrical system. Many facilities and engineers recognized the importance of these pressure monitoring systems and the need for them to continue to function during a normal power outage. CEC, Articles 517-32, 517-33 and 517-34 specifically list what loads can be placed on the Life Safety, Critical, and Equipment Branches of the essential electrical system, respectively. However, since the CEC does not specifically list these alarm systems in any of the three branches of the essential electrical system, confusion exists as to which branch they can be placed on and different interpretations exist.

This proposal would require this important alarm system for monitoring the pressure of negative pressure isolation rooms and positive pressure isolation rooms to be on the Critical Branch of the essential electrical system. This proposed change will eliminate confusion and uncertainty over which branch of the essential electrical system these alarm may be located and enhance uniform application of the code. This change would apply only to acute care hospitals and correctional treatment centers.

**TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS:**

There are no documents to identify.

**CONSIDERATION OF REASONABLE ALTERNATIVES**

There are no alternatives to be considered by OSHPD.

**REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS.**

This proposal will not impose an adverse economic impact on small businesses.

**FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT ON BUSINESS.**

This proposal will not impose an adverse impact on businesses.